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June 2, 2006

Ms. Mary L. Cottrell
Secretary, Administration
Department of Telecommunications and Energy
One South Station
Boston, MA 02110

Re: DTE Docket # 06-48

Dear Ms. Cottrell,

As requested in your correspondence dated May 19, 2006, attached please find the following information for your review:

- 1.) A request was made to provide the "relevant portion of operator's O&M Plan that ensures compliance with Section 116B." Please refer to the attached portion of the Westfield Gas and Electric O & M Plan, specifically Section 12.20 (page 12-24) **Ensuring Valve Accessibility**, which outlines the procedures to be followed to ensure that gas distribution and service valves are easily and immediately accessible.
- 2.) A request was made to provide "an Excel spreadsheet of service territory streets that were paved in 2005, and the date that the gate boxes were made easily and immediately accessible". Please refer to the attached spreadsheet, titled **2005 City of Westfield Street Paving List**, to provide evidence of our compliance.
- 3.) A request was made to provide "the relevant portion of the Operator's O & M Plan that delineates policies concerning how operator employees collect data to ensure compliance with Section 116B." Again, please refer to the attached Section 12.20 (page 12-24) **Ensuring Valve Accessibility** which outlines the procedures to be followed to ensure that operators gather data to ensure compliance.
- 4.) A request was made to provide "relevant evidence that operators are in compliance with Section 116B". The attached letter from Mr. James Mulvenna, Deputy Superintendent of the Westfield Public Works Department, attests to the fact that gas valve boxes are properly prepared by the contractor prior to street restoration. Photographic evidence is also available upon request.

- 5.) At the time the valves are installed, they are done in such a way to ensure accessibility, in accordance with MGL 164 Section 116B. The municipality ensures that valve boxes are raised as part of the paving project. Please refer to Mr. Mulvenna's letter dated May 30, 2006.

Please contact me at (413) 572-0207 should you need any additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel J. Howard". The signature is fluid and cursive, with the first name "Daniel" being more prominent.

Daniel J. Howard
Operations Superintendent

Enclosures

cc: William H. Stevens, Assistant General Counsel
Christopher Bourne, Director